



Department of
AGRICULTURE
FISHERIES &
FORESTRY -
AUSTRALIA



21 August 2002

Ms Sally Stratmoen
Equivalence Section
International Policy Staff
Office of Policy, Program Development and Evaluation
Food Safety and Inspection Service
United States Department of Agriculture
Administration Building
Washington D.C. 20250-3700

Dear Ms Stratmoen

Thank you for the copy of the Draft Final of the Audit Report of Australia's meat inspection system from February 27 2002 to March 28 2002. I note the generally positive findings of the audit including the auditors finding that there had been good progress on the small stock urine spillage issue, and your recognition of the immediate attention to deficiencies identified in this audit.

As discussed between my AQIS colleagues and Dr Parks during the exit meeting, AQIS undertook to issue a series of AQIS Notices addressing several of the issues discussed during the audit. I report the following action in this regard:

Issuance of the following 5 AQIS Notices:

AQIS Notice 2002/9 titled "Operational Sanitation" (Attachment 1)

AQIS Notice 2002/10 titled "Daily Review of Product Monitoring Records" (Attachment 2)

AQIS Notice 2002/11 titled "The Taking and Recording of Preventive Action" Attachment 3)

AQIS Notice 2002/12 titled "Slaughter Floor Zero Tolerance Critical Control Point" (Attachment 4)

AQIS Notice 2002/13 titled "Reassessment of HACCP Plans Annually and Altered Processes" (Attachment 5)

I also advise that the revision of Meat Hygiene Assessment has been completed and the new version will soon be distributed. This is the system used for objective monitoring of product and process.

In relation to the incision of lymph nodes in the heads of cattle raised and slaughtered in Tasmania we note your comments. Current arrangements to

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discontinue inspection of heads because of Tasmania's TB-free status have been in place for a number of years and have not elicited adverse comments in a number of FSIS reviews. It would clearly be our preference to continue with the present inspection arrangements for bovine head lymph node inspection in regions recognised biologically free of bovine tuberculosis by the OIE whilst our two agencies enter into a dialogue to resolve this misunderstanding. As a way of taking this forward I will, in the next few months, have my agency prepare a position paper for your consideration but in the meantime you might let me have your views on this approach.

In relation to your request for confirmation that HACCP deficiencies have been corrected in those establishments that received the equivalent of a "30 day" letter, I enclose a further copy of my 8 May assurance. (Attachment 6)

I would like to point out one minor mistake in the text of the draft report in that on page 5 of the main report under the heading 'Establishment Operations by Establishment Number', that the horse, ratite, swine, deer and camel slaughtering and boning establishment was establishment number 3416 rather than 4510 as reported.


In the interests of maximum clarity, I suggest that the final paragraph in the Monthly Report section of page 10 be replaced with the following text:

"In the event that an establishment is found, during AQIS monthly reviews to be out of compliance with U.S. requirements, and is delisted for U.S. export, before it may again qualify for eligibility and be reinstated, the establishment operator draws up a Corrective Action Plan (CAP) addressing necessary corrective and preventive action. The CAP is then desk audited, followed by an on-site compliance audit conducted by the AQIS On Plant Veterinary Officer and the AQIS Arca Technical Manager. An in-depth group review is then carried out with the lead auditor being a representative of the AQIS Verification Unit".

In regard to the specific establishment reports, AQIS took comprehensive notes during the actual audits and during the exit meeting and in conjunction with the establishment operator has ensured that all issues have been addressed. I note that some of the establishment reports included in the draft final report lack the second page, which is where the specific comments of the auditor are found. (i.e.: for establishments 101, 154, 2346 and 3416), and that there is no report for Establishment 239. I would be grateful to receive the missing comments.

I look forward to a copy of the final report.

Yours sincerely


Greg Read
Executive Manager
Exports